

**REMARKS/ARGUMENTS**

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1-12 are pending in this application.

**Request to Acknowledge Applicant's Claim for Foreign Priority and Receipt of**

**Certified Copy of Priority Documents:**

The present application is a national phase filing of international application no. PCT/GB00/00375 designating the U.S. The Notification of Acceptance of Application Under 35 U.S.C. §371 and 37 CFR 1.494 or 1.495 (Form PCT/DO/EO/903) dated August 15, 2001 expressly acknowledges receipt of the certified priority document. In light of this earlier acknowledgement that the priority document was properly received by the USPTO via WIPO and the PCT process, the Examiner is respectfully requested to review the application and to acknowledge Applicant's claim for foreign priority under 35 U.S.C. §119 and receipt of priority documents.

**Rejections Under 35 U.S.C. §103:**

Claims 1-12 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Sebastian et al (U.S. '602, hereinafter "Sebastian") in view of Talbott et al (U.S. '523, hereinafter "Talbott"). Applicant respectfully traverses this rejection.

In order to establish a prima facie case of obviousness, all of the claimed limitations must be taught or suggested by the prior art and there must be some suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to

combine reference teachings. Applicant submits that the combination of Sebastian and Talbott fails to disclose each element of the claimed invention. For example, the combination fails to teach or suggest two different sets of requirements of a requirements management database system, or assigning unique identifiers to each of the data elements in these two sets as well as a set of functional design specifications. The combination further fails to teach or suggest establishing a set of links arranged to directly associate the unique identifiers of both of the sets of requirements with the unique identifiers of the set (third set) of functional design specifications.

As discussed in the background of the present application (see page 1, line 29 to page 2, line 5), a requirements management database system advantageously includes means for linking a product's functional requirements to subsequently generated functional design specifications for that product. This enables traceability in the sense that when a user is viewing or editing any of the elements in the database (for example, to modify product requirements), it is easy to link to any associated elements to provide easy update and review of all interdependent elements (e.g., to allow corresponding modifications to the functional design specification for the product).

When there are two or more different set of functional requirements (e.g., different customers requiring different versions of a product), database systems generate a superset containing all possible requirements. A functional design specification is then created which satisfies all the differing functional requirements for all versions of the product,

which are linked back to the elements in the superset. The individual functional requirements in the superset are linked back to their original sets of requirements.

However, the present inventors have designed a database system which is different than that described in the background of the present invention. In particular, the present invention relates to storing two sets of requirements and a set of functional design specifications. Also in contrast to the system disclosed in the background of the present application, the present invention assigns unique identifiers to each of the elements in all of the three different sets (two sets of requirements and set of functional design specifications) and establishes a set of links which directly associate the unique identifiers for elements of the functional design specification (i.e., the third set) with unique identifiers for elements from both the first and second sets of requirements. This arrangement advantageously reduces the recompiling of links which would otherwise be required when any of the elements are changed. This arrangement is also not taught or suggested by the combination of Sebastian and Talbott.

The Office Action alleges that Sebastian discloses storing a first set of data elements representing a first set of requirements (col. 15, lines 25-29) and storing a second set of data elements representing a second set of requirements (col. 15, lines 40-47). (See page 3, lines 1-8 of the Office Action). However, Applicant submits that col. 15, lines 40-47 does not disclose a second set of requirements as required by the present invention. This portion of Sebastian merely discloses a procedure for generating a list of potential materials and properties for a tool based on the customer's original requirements

(expanded further at col. 16, lines 39-48), and is therefore not concerned with a second set of requirements as required by independent claims 1 and 7 and their respective dependents.

The Office Action further admits “Sebastian (sic) does not explicitly teach means for assigning a unique identifier to each data element of each of said first, second and third sets of data elements; means for establishing a set of links arranged to directly associate identifiers of data elements from said first set and to directly associate identifiers of data elements from said second set with identifiers of data elements from said third sets.” (See page 3, lines 9-13 of the Office Action). Applicant submits that Talbott fails to remedy this deficiency of Sebastian. In particular, Talbott describes a tool for system design which assists engineers to develop models of different design levels necessary to implement a system. For example, Fig. 3 of Talbott shows a model concept which comprises a pyramid structure with the original requirements shown at the top, and mapping down to various functional specifications and implementations below. While Talbott describes linking between levels so as to allow traceability between different stages (as also in the case in the acknowledged prior art in the background section of the present application), Talbott fails to describe how the tool would be modified or operate when there are two different sets of requirements for a system. Talbott further fails to teach or suggest how these two different sets of requirements for the system would be mapped to functional design specification(s). Accordingly, even if Sebastian and Talbott

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***April 5, 2004***

were combined as proposed by the Office Action, the combination would not have taught or suggested all of the claimed limitations.

Accordingly, Applicant submits that claims 1-12 are not "obvious" over the combination of Sebastian and Talbott and respectfully requests that the rejection of these claims under 35 U.S.C. §103 be withdrawn.

**Conclusion:**

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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Figure 1

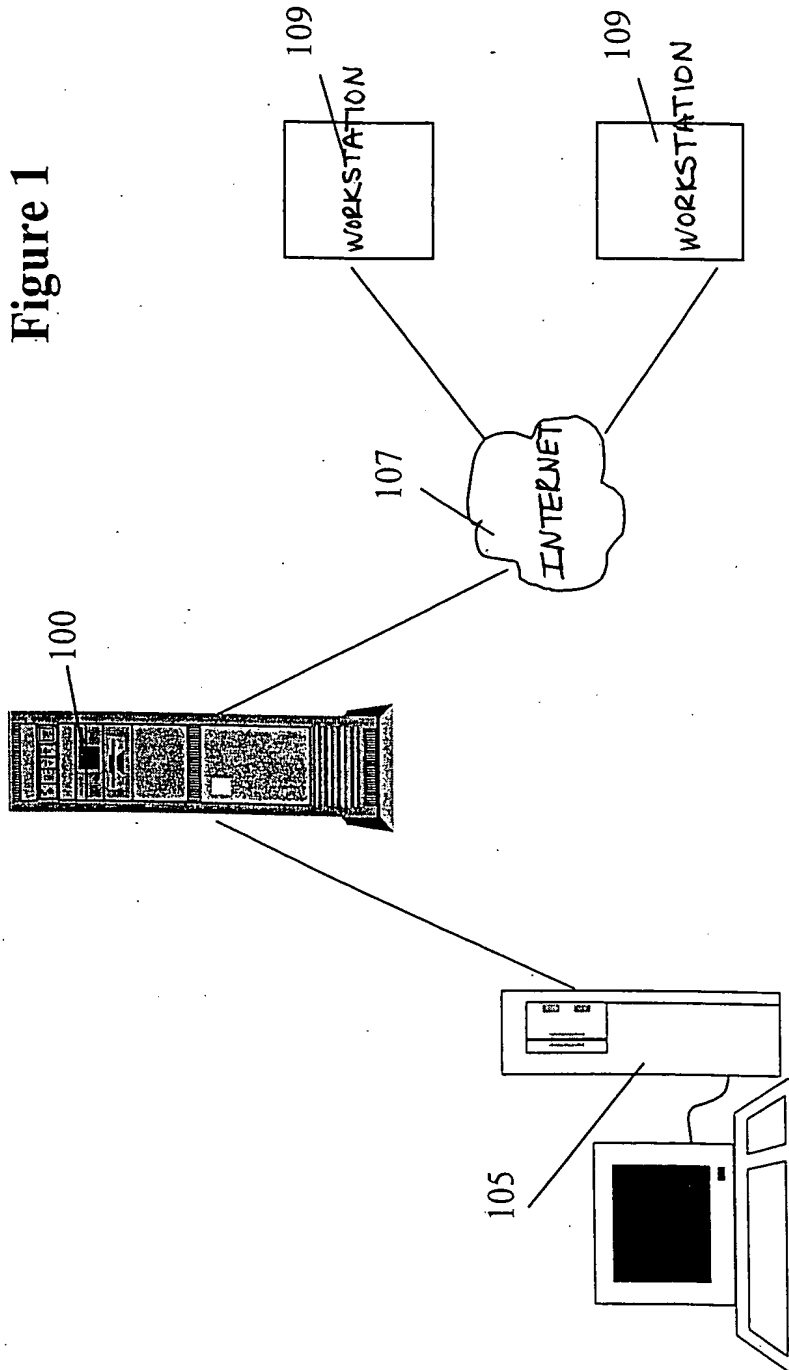
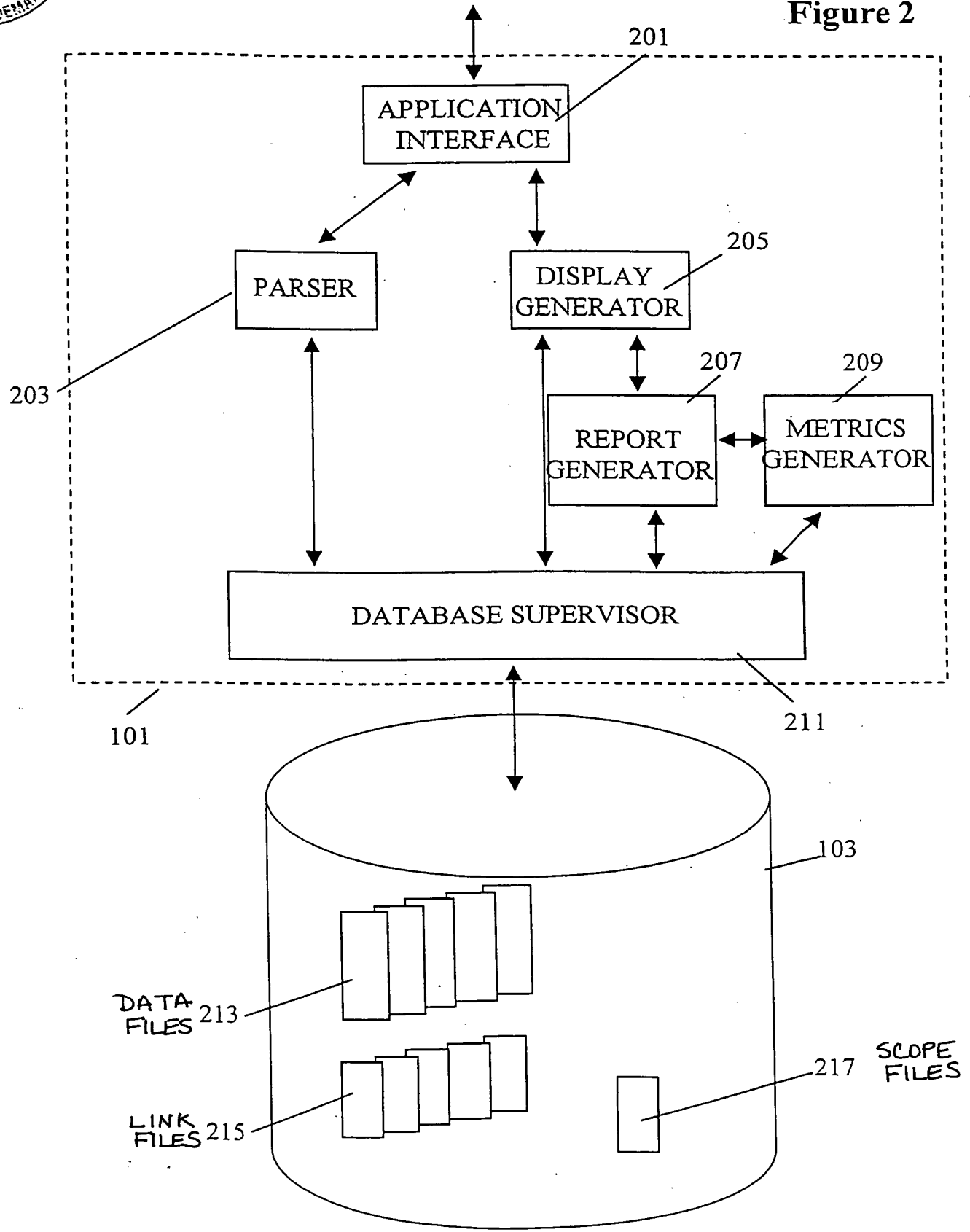


Figure 2



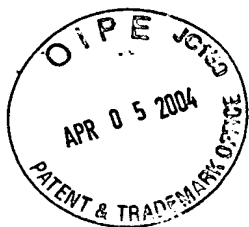


Figure 8

DATA ELEMENT IDENTIFIER	DATA ELEMENT	REFERENCES	
FSA-FS-456	HOW THE XXX DOES AAA	SRSA-SRS-123 UTA-UT-135	907
FSA-FS-246	HOW THE XXX DOES BBB	SRSB-SRS-321 UTAA-UT-678	909
			801 803 807 809 805